

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI

IN RE: KAREN MCDANIEL TODD,  
DEBTOR(S)

CHAPTER 13 BANKRUPTCY  
CASE NO. 20-50110-KMS

DAVID RAWLINGS, TRUSTEE

**TRUSTEE'S RESPONSE TO  
MOTION TO SELL**

COMES NOW, the Chapter 13 Trustee, David Rawlings, by and through his attorney, and files this Response to the Debtor's Motion to Sell (Docket No. 61), and says that the Trustee has no objection to the sale price; Trustee has no objection to the Debtor receiving her full homestead exemption of \$75,000, however, Debtor's Schedule C only claimed \$44,646.00 as her homestead exemption; unless Schedule C is amended to claim the full homestead exemption, the Debtor may only receive \$44,646.00.

Respectfully submitted,

DAVID RAWLINGS, TRUSTEE

BY: /s/Samuel J. Duncan  
Samuel J. Duncan,  
His Attorney

Samuel J. Duncan  
Attorney for Chapter 13 Trustee  
Post Office Box 566  
Hattiesburg, MS 39403-0566  
Telephone: (601) 582-5011  
Miss. Bar No. 6234

**CERTIFICATE OF SERVICE**

I, the undersigned, do hereby certify that I have on this day forwarded a true and correct copy of the foregoing Response, via the Court's ecf filing system, to: the US Trustee, 501 East Court Street, Suite 6-430, Jackson, Mississippi 39201; and TC Rollins Jr, PO Box 16767, Jackson, MS 39236.

So certified on this the 7<sup>th</sup> day of February, 2023.

/s/Samuel J. Duncan

Samuel J. Duncan